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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 JOANNE LIU and WESLEY CHONG,
10

11 Plaintiffs,

12 vs.

13 STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, and DOES I
14 through X, inclusive,

15 Defendants.

CASE NO.: 2:22-cv-00099- CDS-VCF

16 **STIULATION AND ORDER TO EXTEND DISCOVERY**

17 **(Second Request)**

18
19 Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by
20 and through its attorneys, Christine M. Booze and Rachel L. Shelstad of the law firm WINNER
21 & BOOZE, and Plaintiffs JOANNE LIU and WESLEY CHONG, by and through their attorney,
22 Robert E. Marshall, of the MARSHALL LAW OFFICE, hereby submit the following Stipulation
23 and (Proposed) Order to Extend Discovery pursuant to LR 26-4 LR IA 6-1.

24 This is the second stipulation for an extension of discovery deadlines.

25 **A. Discovery Completed**

26 Plaintiffs have served their initial FRCP disclosure of witnesses and documents, and one
27 supplement thereto.

28 Defendant has served its initial FRCP disclosure of witnesses and documents and

1 fourteen supplements thereto.

2 Plaintiffs have served their initial Expert Witness Designation.

3 Defendant has served its initial Expert Witness Designation and two supplements thereto.

4 Defendant has served its initial Rebuttal Expert Witness Designation and one supplement
5 thereto.

6 Defendant has served one set of Interrogatories and one set of Requests for the
7 Production of Documents to Plaintiff, which have been answered.

8 Plaintiff has served one set of Interrogatories, one set of Requests for the Production of
9 Documents to Defendant, which have been answered.

10 Defendant has deposed Plaintiffs' multiple medical doctors:

- 11 • Dr. Antonino Gumina;
- 12 • Dr. Nancy Hsiao
- 13 • Dr. David Lanzkowky;
- 14 • Dr. Enrico Fazzini;
- 15 • Dr. Inchol Yun;
- 16 • Dr. Russell Glassman.

17 Defendant has taken the Examination Under Oath of Plaintiff Joanne Liu, volumes I and
18 II.

19 Defendant has taken the Examination Under Oat of Plaintiff Wesley Chong, volume I.

20 Multiple Subpoena Duces Tecum have been served upon plaintiff's medical providers in
21 order to obtain the medical records of plaintiffs Joanne Liu and Wesley Chong.

22 **Discovery that Remains to Be Completed**

23 Videotaped deposition of plaintiff Joanne Liu.

24 Videotaped deposition of plaintiff Wesley Chong. Mr. Chong's deposition is scheduled
25 and set to take place on 1/24/2023.

26 Experts will need to review new medical records and supplement their reports.

27 Plaintiff reserves the right to depose the Defendant's medical experts.

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**B. The Reasons Why Discovery Was Not Completed In the Time Limits Set by the
Discovery Plan**

Coordinating a date for the Plaintiff Joanne Liu's deposition.

Counsels for both parties are attempting to schedule the date, in which Plaintiff Joanne Liu's deposition can be conducted.

A 30-day extension of discovery is respectfully requested to permit the deposition and to permit experts to complete supplemental reports based on their review of medical records.

C. Proposed Schedule for Completing Discovery

The parties propose to complete discovery on the following deadlines:

- Discovery Cut-Off: March 9, 2023
- Deadline to Disclose Initial Experts: No Extension Requested
- Deadline to Disclose Rebuttal Experts: No Extension Requested
- Deadline to File Dispositive Motions: April 10, 2023
- Deadline to File Joint Pre-Trial Order May 10, 2023
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If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 23rd day of January, 2023.


DATED this 23 day of January, 2023.

WINNER & BOOZE

MARSHALL LAW OFFICE

/s/ Rachel L. Shelstad

By: _____

By:  _____

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IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

DATED 1-24-2023